

SCOTT N. SCHOOLS (SC 9990)
United States Attorney

BRIAN J. STRETCH (CSBN 163973)
Chief, Criminal Division

JEFFREY R. FINIGAN (CASBN 168285)
Assistant United States Attorney

450 Golden Gate Avenue
San Francisco, California 94102
Telephone: (415) 436-7232
Facsimile: (415) 436-7234
Email: jeffrey.finigan@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
DEBRA EDISON,)
)
Defendant.)

Criminal No. CR 07-0479 WHA

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME &
CONTINUING HEARING**

The above-captioned matter came before the Court on December 11, 2007. The defendant was represented by Shawn Halbert, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was set before this Court for further status on December 18, 2007, due to the withdrawal of counsel in the related case of U.S. v. Michael Edison, CR 07-0074.

The Court made a finding that the time from and including December 11, 2007, through and including December 18, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C.

STIPULATION AND [PROPOSED] ORDER
EXCLUDING TIME
CR 07-0479 WHA

1 § 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best
2 interest of the public and the defendant in a speedy trial. The finding was based on the need for
3 the defendant to have reasonable time necessary for effective preparation, taking into account the
4 fact that the matter is related to the U.S. v. Michael Edison case and exercise of due diligence,
5 and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

6 The parties hereby agree to and request that the case be continued until December 18,
7 2007, and that the exclusion of time until then be granted. The parties agree and stipulate that the
8 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
9 because the ends of justice served by this continuance outweigh the best interest of the public and
10 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
11 prepare, taking into account the exercise of due diligence, and will provide for continuity of
12 counsel for the defendant.

13
14
15 DATED: December 12, 2007

/s/

SHAWN HALBERT
Counsel for Debra Edison

16
17
18 DATED: December 12, 2007

/s/

JEFFREY R. FINIGAN
Assistant U.S. Attorney

19
20
21 So ordered.

22 DATED:

WILLIAM H. ALSUP
UNITED STATES DISTRICT COURT JUDGE